

# Faraci Lange

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## ATTORNEYS

February 25, 2025

### BY CM/ECF FILING

Hon. H. Kenneth Schroeder, Jr.  
United States Magistrate Judge  
United States District Court – Western District of New York  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, New York 14202

**Re: Carol Marcellin, et al., v. HP, Inc. et al.,  
Case No. 1:21-cv-00704-JLS-HKS**

Dear Judge Schroeder:

Counsel for Plaintiffs and Defendants have met and conferred and jointly request a short extension of the current Scheduling Order deadlines for expert depositions and dispositive motions in the above-referenced matter.

Plaintiffs have served reports from three experts and Defendants have served reports from five experts. We now have dates for these eight expert depositions scheduled between March 7, 2025 and April 7, 2025 as follows:

Plaintiff's expert Martin – March 7, 2025  
Plaintiff's expert Litzinger – March 20, 2025  
Plaintiff's expert Karasinski – March 27, 2025  
Defendants' expert Sala – March 18, 2025  
Defendants' expert Galler – March 24, 2025  
Defendants' expert Myers – April 1, 2025  
Defendants' expert Quinn – April 3, 2025  
Defendants' expert Dupee – April 7, 2025

The current deadline for completion of expert depositions is March 3, 2025 and for filing of dispositive motions April 7, 2025.

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The parties jointly respectfully request an extension of the expert deposition deadline to April 7, 2025, and of the dispositive motion deadline to May 12, 2025.

Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen G. Schwarz", written in a cursive style.

Stephen G. Schwarz  
sschwarz@faraci.com

xc: All Counsel of Record via CM/ECF